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James Hamilton, Timothy Artoff,
and Jason McGinnis

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

Abolish Abortion Oregon,
an Unincorporated Association;
Mason Goodknight, an Individual;
Shawn Kellim, an Individual;
Ryan Clark, an Individual; **Mark**
Mayberry, an Individual; **Lori Mayberry,**
an Individual; **Robby Mayberry,** an
Individual; and **Ricky Mayberry,**
an Individual.

Plaintiffs,

v.

City of Grants Pass, a Municipality;
James Hamilton, an Individual;
Timothy Artoff, an Individual;
Jason McGinnis, an Individual;
and **Does I through 50,** Inclusive,

Defendants.

Case No. 1:20-cv-00484-AA

Declaration
of Tori Rumrey

I, Tori Rumrey, hereby declare under penalty of perjury as follows:

I am over the age of 18 years, and I make this declaration based on my personal knowledge of the facts contained herein.

I am a Nurse Practitioner who specializes in Family Medicine. My office, Rumrey Family Practice, is currently located at 1587 NW Washington Street, Grants Pass, Oregon. Prior to the end of June 2020, my office was located at 1585 NW Washington Street. My office moved from 1585 to 1587 when Doctor Dan Gleffe, MD, retired at the end of June 2020. Before Doctor Dan Gleffe, MD, retired, his office was located at 1587 NW Washington Street.

Both 1585 NW Washington Street and 1587 NW Washington Street share a large building, a common building entrance, and a common parking lot. The building is located adjacent to the building occupied by Planned Parenthood, to the West. See Exhibit 110.

Over the past year and a half, on more than 10 occasions, the anti-abortion protesters would come to the location of our office building.

Sometimes these protesters would stand on the sidewalk that runs adjacent to our office on Washington Street at our driveway, between line 1 and line 7 on Exhibit 110, or they would walk up and down the sidewalk between line 1 and 7. While they were at those locations, often one of them would use a voice amplifier at a high volume and point the speaker towards our building and the building occupied by Planned Parenthood.

Sometimes the protesters would stand on the sidewalk that runs adjacent to our office on Washington Street at the location where there is a cement walkway that goes from the sidewalk to the entrance to our office, which is shown as line 3 on Exhibit 110. They would block the entrance from the sidewalk to the cement walkway so people and patients coming to our office would have to walk through them to get to the entrance to our office.

Sometimes the protesters would stand in Washington Street, trying to get the attention of cars driving by.

Sometimes the protesters would stand in Washington Street as I was leaving our parking lot. They would stand in such a position that I could not see traffic coming from my left as I tried to pull out of our parking lot. Sometimes they would stand in front of my car as I was trying to get out of the parking lot, giving me the choice of stopping or running over them.

Sometimes the protesters would stand on the sidewalk that runs adjacent to our office on Washington Street where Washington Street intersects with NW Franklin Boulevard, shown as lines 4 and 5 on Exhibit 110. When they would stand at or near the location shown as lines 4 and 5, one of them would use a voice amplifier at a high volume and point the speaker towards the building occupied by Planned Parenthood and in the general direction of our building.

Regardless of the location of the use of the voice amplifier, the noise from the speaker, because it was so loud, could be heard inside of our office. It was so loud, I could clearly make out what was being said, and it was louder than the normal voice I used in a conversation with someone inside of our office. I had to talk over the noise in order to do my job and perform my duties. The noise from the speaker was annoying and a nuisance. The noise caused me a great deal of inconvenience and disturbed the way I normally performed my duties, including making and receiving telephone calls, communicating with patients, and rendering medical care and services.

It also should be known that I often perform examinations of my patients. I have to listen to their heartbeat, ask various questions, and take various measurements. The loud noise from the speakers interfered with my ability to complete these examinations in a normal manner. My patients have the right to be examined and treated in a quiet, peaceful environment.

What made matters worse, was that it was a continuous loud noise from the speaker that went on for an hour to two hours. It was constant and relentless. It was just a continual, disturbing loud noise, that interfered with my performance of my duties.

My patients required a comfortable, relaxing, and helpful environment because such an environment was necessary to put my patients at ease and decrease their worry about their condition and treatment. Part of my treatment is to make sure my patients were at ease. I don't want my patients to worry about their condition or treatment.

The loud noise from the speaker also caused my patients to become anxious. It created a stressful and disturbing environment for my patients, and certainly interfered with my ability to provide a comfortable and relaxing environment. The noise created an unwelcome interference with my ability to provide proper medical care and the noise was an invasive intrusion into the peace and quiet of my patients.

PURSUANT TO 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.



Tori Rumrey

9/3/20

Date